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January 11, 2019
Magistrate Judge Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Room N208
Brooklyn, New York 11201

Re: Bonikos et al. v. 50 Front Street Enterprises, Inc. et al.,
1:17-cv-06076 (ARR) (RER)

Update on the Status of the Updated Joint Pre-Trial Order
Due January 11, 2019

Dear Magistrate Judge Reyes:

We are writing to provide you with a brief update on the status of the Joint Pre-Trial Order, due today. Counsel and opposing counsel have been working diligently on this and, despite our best efforts, still expect to need one Monday morning, January 14, 2019 to finalize it.

This lapse was in large part due to our firm not being able to deliver our part of the revised Joint Pre-Trial Order to opposing counsel for their review until 5PM this evening. This occurred due to a substantial disruption in our small law firm's anticipated normal workflow of depositions and court appearances which was due an unexpected event arising in an unrelated matter in the Eastern District of New York, *Hammock v. Moving State to State, LLC et. al.*, 1:18-cv-05628-SJ-ST. The unexpected events of the evening of Thursday, January 3 in that matter required our firm to draft motion papers and be in Court in order to attempt to prevent irreparable harm to the Plaintiff in that case on an emergency temporary restraining order hearing on January 4, a combined second temporary restraining order hearing, preliminary injunction hearing, and contempt hearing on January 8, and a combined second preliminary injunction hearing and second contempt hearing on January 9. We were then required to update the Court in that matter by today on all attempts at service as well as compliance.

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Although we had hoped opposing counsel would have time to quickly review our draft and revisions so that we might all meet the Court's deadline, neither do we fault them for not doing so. We beg the Court's understanding on this matter and expect to submit the Updated Joint Pre-Trial Order by midday Monday, January 14, 2019.

Respectfully Submitted,

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